



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

*271 Cadman Plaza East*

*Brooklyn, New York 11201*

DSS:KKO  
F.#2009R00637

December 7, 2011

By Hand and ECF

The Honorable Edward R. Korman  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Mousa Khouli, et al.  
Criminal Docket No. 11-340 (ERK)

Dear Judge Korman:

The government respectfully submits this letter to request an extension of time from December 12, 2011 to February 10, 2012 to respond to defendant Alshdaifat's change of venue motion. Defendant Alshdaifat, through his attorney, Henry Mazurek, takes no position with respect to this request.

The government first learned of Alshdaifat's intent to file a motion to change venue at the status conference on November 17, 2011. At that time, the government agreed to a briefing schedule and oral argument on the motion in December 2011 while the undersigned Assistant is preparing for a trial in United States v. Beckford, et al., Criminal Docket No. 09-525 (S-1)(DLI). The Beckford trial is scheduled to begin with jury selection on January 3, 2012, followed by trial commencing on January 9, 2012, and is expected to last approximately three weeks. On November 22, 2011, Alshdaifat filed a 52-page memorandum of law with approximately 60 pages of exhibits. In light of the unanticipated voluminous nature of Alshdaifat's motion and the undersigned Assistant's trial schedule, the government requests an extension of time until February 10, 2012 to review and respond to Alshdaifat's motion.

Thank you in advance for your consideration in this matter.

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

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Karin Orenstein  
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cc: Counsel of Record (by ECF)  
Clerk of Court (ERK) (by ECF)